

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Civil Action No. 17-4367
)	
v.)	Judge Susan Richard Nelson
)	
CITY OF CASS LAKE,)	Magistrate Judge Leo I. Brisbois
MINNESOTA)	
)	
Defendant.)	

**PLAINTIFF UNITED STATES’
MOTION TO ENTER CONSENT DECREE**

The United States asks this Court to approve its settlement with the City of Cass Lake. Cass Lake is a city of about 750 people with limited financial resources. The United States’ complaint in this case alleges that the City is liable under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 *et seq.*, commonly known as CERCLA or Superfund, for costs at the St. Regis Paper Company Superfund Site (“Site”) in Cass Lake, Minnesota. The proposed Consent Decree resolves the City’s liability in exchange for a small payment based on the City’s ability to pay and the City’s commitment to cooperate with future work.

The City supports this motion.

The United States also sought public comment on the Consent Decree, and received a comment from International Paper Company, another responsible party at the

Site. As described in greater detail in the accompanying brief, the United States has examined International Paper's comments and determined that the Consent Decree is fair, reasonable, and consistent with CERCLA.

Therefore, the United States asks this Court to sign and enter the decree as final judgment in this action.

Respectfully submitted,

JEFFREY H. WOOD
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Environment and Natural Resources Division
United States Department of Justice

s/Thomas A. Benson
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CERTIFICATE OF SERVICE

Pursuant to Paragraph 51 of the accompanying Consent Decree, I hereby certify that copies of the foregoing motion and all supporting materials were served on this date by email to the following individuals on behalf of the City of Cass Lake:

Sue Uhrinak

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Sara Peterson

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In addition, a copy of the foregoing motion and all supporting materials was served on this date by email to counsel on behalf of commenter International Paper:

Rick Rothman

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